

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
DAVINAH ABDEL BAAITH,	:	Violations:
RENARD PURNELL,	:	18 U.S.C. § 371
CARL HAMILTON	:	(Conspiracy - 1 Count)
		18 U.S.C. § 656
		(Embezzlement of funds by bank employee -
		7 Counts)
		18 U.S.C. § 2
		(Aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times relevant to this indictment, the Summit Bank operated a bank branch inside of a Genuardi's supermarket located at 25 W. Germantown Pike in East Norriton, Pennsylvania ("Summit Bank").

2. At all times relevant to this indictment, defendant DAVINAH ABDEL BAAITH was the branch manager of Summit Bank.

3. At all times relevant to this indictment, defendant RENARD PURNELL was a bank teller employed at Summit Bank.

4. From in or around May 2000 to in or around June 2000, at East Norriton, in the Eastern District of Pennsylvania, defendants

DAVINAH ABDEL BAAITH
RENARD PURNELL
and
CARL HAMILTON

conspired and agreed together to commit an offense against the United States, that is, to knowingly embezzle funds from Summit Bank, in violation of Title 18, United States Code, Section 656.

MANNER AND MEANS

5. The object of the conspiracy was to steal cash from Summit Bank.

It was further part of the conspiracy that:

6. Defendant DAVINAH ABDEL BAAITH, who was branch manager at Summit Bank, and defendant RENARD PURNELL, who was a bank teller at Summit Bank, both of whom had access to Summit Bank money in their branch, took several thousand dollars in Summit Bank cash and gave it to defendant CARL HAMILTON.

7. Defendants DAVINAH ABDEL BAAITH, RENARD PURNELL, and CARL HAMILTON later split the stolen money.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, the following overt acts, among others, were committed in the Eastern District of Pennsylvania:

The following occurred on or about Friday, May 26, 2000:

1. While at Summit Bank, defendant DAVINAH ABDEL BAAITH stole approximately \$15,000 of Summit Bank cash.

2. Defendant DAVINAH ABDEL BAAITH put the stolen money into a bag.

3. Defendant DAVINAH ABDEL BAAITH gave the bag of stolen money to defendant CARL HAMILTON.

4. Defendant CARL HAMILTON carried the bag of stolen money out of Summit Bank.

The following occurred on or about Tuesday, June 13, 2000:

5. While at Summit Bank, defendants DAVINAH ABDEL BAAITH and

RENARD PURNELL stole approximately \$15,000 of Summit Bank cash.

6. Defendants DAVINAH ABDEL BAAITH and RENARD PURNELL put the stolen money into a bag.

7. Defendant RENARD PURNELL carried the bag of stolen money out of Summit Bank and gave it to defendant CARL HAMILTON in the Summit Bank parking lot.

8. Defendant CARL HAMILTON carried the bag of stolen money away from the Summit Bank parking lot.

The following occurred on or about Sunday, June 18, 2000:

9. Defendant DAVINAH ABDEL BAAITH stole approximately \$31,624 of Summit Bank cash.

10. Defendant DAVINAH ABDEL BAAITH put the stolen money into a bag.

11. Defendant DAVINAH ABDEL BAAITH carried the bag of stolen money out of Summit Bank and gave it to defendant CARL HAMILTON in the Summit Bank parking lot.

12. Defendant CARL HAMILTON carried the bag of stolen money away from the Summit Bank parking lot.

In violation of Title 18, United States Code, Section 371.

COUNTS TWO THROUGH FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about the following dates, at East Norriton, in the Eastern District of Pennsylvania, defendant

DAVINAH ABDEL BAAITH,

being an employee, that is, a branch manager, of Summit Bank, the accounts of which were insured by the Federal Deposit Insurance Corporation, knowingly embezzled and willfully misapplied, and aided and abetted the embezzlement and misapplication of, the following amounts of funds and monies entrusted to the custody and care of Summit Bank:

<u>COUNT</u>	<u>ON OR ABOUT</u>	<u>AMOUNT (approximate)</u>
2	Friday, May 26, 2000	\$15,000
3	Tuesday, June 13, 2000	\$15,000
4	Sunday, June 18, 2000	\$31,624

All in violation of Title 18, United States Code, Sections 656 and 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about Tuesday, June 13, 2000, at East Norriton, in the Eastern District of Pennsylvania, defendant

RENARD PURNELL,

being an employee, that is, a bank teller, of Summit Bank, the accounts of which were insured by the Federal Deposit Insurance Corporation, knowingly embezzled and willfully misapplied, and aided and abetted the embezzlement and misapplication of, approximately \$15,000 of funds and monies entrusted to the custody and care of Summit Bank.

In violation of Title 18, United States Code, Sections 656 and 2.

COUNTS SIX THROUGH EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about the following dates, at East Norriton, in the Eastern District of Pennsylvania, defendant

CARL HAMILTON

knowingly aided and abetted employees of Summit Bank, the accounts of which were insured by the Federal Deposit Insurance Corporation, to embezzle and wilfully misapply the following amounts of funds and monies entrusted to the custody and care of Summit Bank:

<u>COUNT</u>	<u>ON OR ABOUT</u>	<u>AMOUNT (approximate)</u>
6	Friday, May 26, 2000	\$15,000
7	Tuesday, June 13, 2000	\$15,000
8	Sunday, June 18, 2000	\$31,624

All in violation of Title 18, United States Code, Sections 656 and 2.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney